



Chino Mines Company, Hurley, New Mexico 88043 • (505) 537-3381

October 21, 2004

Certified Mail #70993400000643533828

Return Receipt Requested

Mr. George Schuman
New Mexico Environment Department
Ground Water Quality Bureau
P. O. Box 26110
Santa Fe, New Mexico 87502

RECEIVED
04 OCT 27 AM 11:06
SUPERFUND DIV.
DIRECTOR'S OFFICE

Dear Mr. Schuman:

**Re: Corrective Action Proposal for the Groundhog Mine Site
 Headwall Collection System and Interim Remedial Action (IRA) Schedule**

This proposal and IRA schedule is submitted in response to the New Mexico Environment Department (NMED) letter to Chino Mines Company (Chino) dated September 23, 2004 in reference to the release of water from the Groundhog Mine Site headwall collection system on August 18, 2004. Under this proposal, the headwall system will have improved capacity for capturing and removing seepage derived by significant precipitation. Furthermore, completion of the IRA will abate the seepage and ground water at the site through source control.

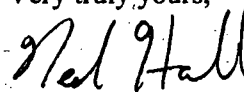
The following summarizes the detailed corrective actions and the associated schedule to prevent further discharge of seepage from the Groundhog Mine Site.

1. Chino replaced the submersible pump at the primary sump with a significantly higher capacity system that is better suited for higher subsurface seepage flow rates associated with precipitation. See attached Figure 1 that shows the location of the primary and backup containment sumps.
2. Chino is replacing the 4-inch diameter pipeline that transports the collected seepage at the headwall to Reservoir 17 with a dedicated 6-inch diameter pipeline that is independent of the Dam 16 pipeline. The larger pipe will reduce the potential for system failure at both the Groundhog seepage collection system and at Dam 16 located in Whitewater Creek. This larger pipeline will also better accommodate the stormwater containment system as designed in the IRA workplan after removal of the stockpile material at Groundhog. See attached Figure 1 for details.
3. The removal of Groundhog material described in the IRA will resume in December 2004 as planned due to suspension of Lake One material haulage during replacement of the tailing pipelines. Removal of approximately 90 percent of the remaining Groundhog stockpile material (Figure 1) will be completed by April 1, 2005. Following removal, reclamation with cover soil and seeding will then proceed and be completed by September 2005. The remaining 10 percent of stockpile material remaining at the site will support the existing pipeline corridor and cannot be removed until the Ivanhoe Concentrator is closed.

4. Plans for the evaluation of ground and surface water at the Groundhog Mine Site are submitted herein. Chino will accelerate the sampling and assessment of ground and surface water quality and submit a report to NMED by November 30, 2004 that will contain the following information.
- a. Monitor wells GH-2004-2S and GH-2004-2D will be sampled twice a year (October and March) and analyzed for the following constituents: cadmium, cobalt, copper, fluoride, iron, lead, manganese, nickel, zinc, sulfate, and total dissolved solids. These results will indicate whether ground water meets or exceeds WQCC Regulation 20.6.2.3103 ground water quality numerical standards. Monitor wells GH-2004-2S and GH-2004-2D have depths of 84.8 feet and 157.6 feet respectively.
 - b. Surface water runoff at the headwall will be collected when available during those same months and analyzed for the same parameters.
 - c. This information will be reported to NMED semiannually in April and November until reporting requirements prescribed by the IRA stockpile removal workplan go into effect.

If you require additional information, please have your staff contact Ms. Pam Pinson at (505) 537-4213.

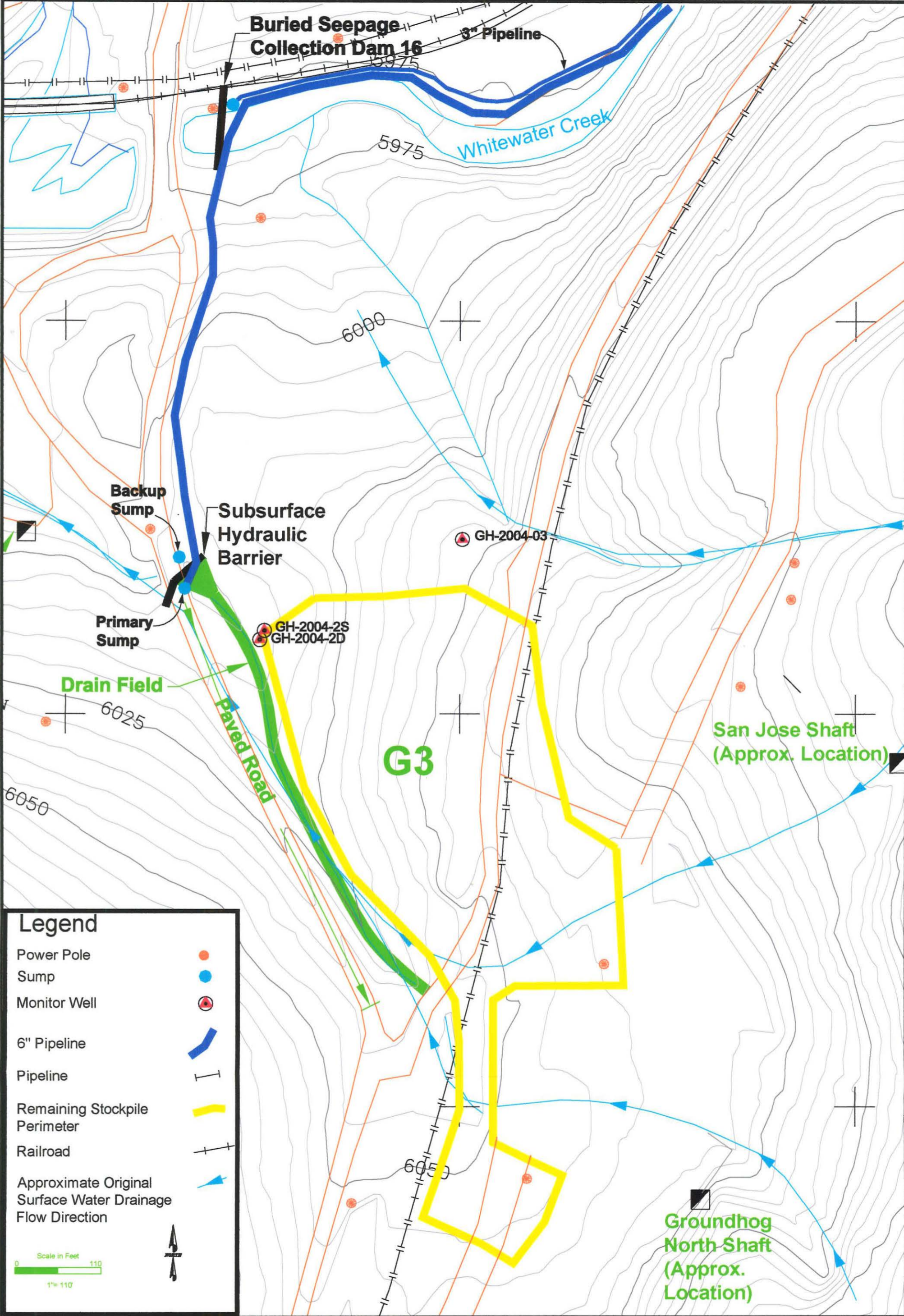
Very truly yours,




E. L. (Ned) Hall
Chief Environmental Engineer
Environment, Land & Water
New Mexico Operations

ELH:pp
Attachment
20041021-001

c: Mr. Chris Eustice, NMED
Mr. Phil Harrigan, NMED
Mr. Al Pasteris, NMED
Ms. Karen Garcia, MMD
Ms. Petra Sanchez, EPA



Drawn	SMG
Designed	
Checked	
Date	10-21-04
Job No.	

**CHINO MINES COMPANY**

**Proposed Improvements
For Groundhog Headwall
Containment System**

Scale:	1" = 110'
Dept.	ENVIRONMENTAL SERVICES
Drawing No.	Figure 1
Rev.	0